EXHIBIT 11

UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, D.C.

Before the Honorable Theodore R. Essex
Administrative Law Judge

In the Matter of: CERTAIN COMPUTERS AND COMPUTER PERIPHERAL DEVICES AND COMPONENTS THEREOF AND PRODUCTS CONTAINING THE SAME	**Investigation No. 337-TA-841**

COMPLAINANT TECHNOLOGY PROPERTIES LIMITED LLC'S POST-HEARING REPLY BRIEF

evidence a declaration from Toshiba regarding any documents. Instead, Respondents subpoenaed Toshiba to attend the hearing and authenticate the document. Toshiba moved to quash the subpoena and noted it its supporting papers that counsel for HP admitted "dropping the ball" with respect to RX-0862. (Doc. No. 500556, Dec. of Dylan Carson at ¶6)

Despite the failure to follow the evidentiary rules, Respondents are attempting to invalidate the '443. '424, and '847 patents with this document. (Doc. No. 502296 at 155-158.) At least one of which is marked confidential, RX-0861, and could not be prior art regardless of Respondents' authentication and corroboration issues. *See Certain Baseband Processor Chips and Chipsets, Transmitter and Receiver Chips, Power Control Chips, and Products Containing the Same*, Inv. No. 337-TA-543.

e. Lipponen

Lipponen fails to disclose at least a "multi-memory media adapter and therefore cannot anticipate the '443/'424/'847 patents." (Doc. No. 502296 at 100.) Lipponen supports two types of "cards" but there is *only one memory media card* diclsosed. SIM cards, or "Subscriber Identification Module" cards, are not memory media cards. (RX-0807 at 1:11-14; 1:27-30; RX-0985 at ¶ 0002.) Instead SIM cards are embedded integrated circuits used primarily for identification purposes on mobile telephony devices such as mobile phones. (RX-0807 at 1:11-14; 1:27-30; RX-0985 at ¶ 0002.) A SIM card stores phone numbers or messages. (RX-0807 at 1:30-32; RX-0985 at ¶ 0002.) Respondents contend that the mere existence of flash memory in the SIM card equates it to an MMC or SD card. (McAlexander, Tr. At 1553:14-16; Doc. No. 502296 at 99.) Unless a reference discloses, within the four corners of the document, not only all of the limitations claimed but also all of the limitations arranged or combined in the same way as recited in the claim, it cannot be said to prove prior invention of the thing claimed and, thus, cannot anticipate under 35 U.S.C. § 102. *Net MoneyIN, Inc. v. VeriSign, Inc.*, 545 F.3d 1359,

1371 (Fed. Cir. 2008). The media memory cards claimed in the patents in suit, including SD and MMC cards, store any type of digital media, such as audio data and video data. Media memory cards claimed in the patents in suit are used in digital cameras, printers, GPS receivers, and other multi-media devices. (JX-0003 at 1:50-61; JX-0004 at 1:51-63; JX-0006 at 5:41-46 and 6:10-18). SIM cards are limited to mobile telephony devices. (RX-0807 at 1:11-32; RX-0985 at ¶ 0002.)

The claims of the Lipponen reference confirm that the SIM card is not a memory media card. Claim 17 of the '498 patent claims a mobile station wherein "one of the first and second interface cards is a memory card." (RX-0807 at 15:59-60.) In other words, only one, not both, of the interface cards is a memory card. Nowhere does the '498 patent expressly claim two interface card slots receiving two memory cards, because the intention of the '498 patent was for one interface card slot to receive an MMC card while the second interface card slot would receive a SIM card, as seen, for example, in Claims 1 and 7. (RX-807 at 12:36-14:34.) Thus, Lipponen does not disclose a "multi-memory adapter" in Claim 1 or disclose a "plurality of memory media cards."

f. The Sun References

The '462 publication and '007 patent ("the Sun references") do not disclose mapping as claimed in the '443, '424, and '847 patents. Respondents contend the Sun references Microprocessor 60 is a controller or controller chip. (Doc. No. 502296 at 143-144.) Figures 15 and 16 merely disclose a Microprocessor 60, which connects to interface connectors 61 and 62, which in turn connect to the common socket device. (RX-0819.0016-0017.) More than this simple disclosure of basic circuitry is required to show mapping or mapping to specific signal lines. *VeriSign, Inc.*, 545 F.3d at 1371. Selecting between an SM connector 61 and an SD/MMC